

**FILED**

10/9/2015

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**RECEIVED**

OCT 05 2015

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Marvin Scott

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

15c8864  
Judge Ruben Castillo  
Magistrate Judge Susan E. Cox  
PC 3  
Case  
(To be supplied by the Clerk of this Court)

Mayor Rahm Emanuel  
John Doe's  
Chicago City Council

Professor: Daniel T. Coyne

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**CHECK ONE ONLY:**

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: MARVIN SCOTT
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: B19625
- D. Place of present confinement: WESTERN CORRECTIONAL CENTER
- E. Address: 2500 Rt 99 South Mount Sterling IL, 62353

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: RAHM EMANUEL  
Title: MAYOR OF CHICAGO  
Place of Employment: CITY HALL
- B. Defendant: JOHN DOE'S  
Title: CHICAGO CITY COUNCIL  
Place of Employment: CITY HALL
- C. Defendant: DANIEL T. COYNE  
Title: PROFESSOR  
Place of Employment: CHICAGO KENT COLLEGE

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: NA
- B. Approximate date of filing lawsuit: NA
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: NA
- D. List all defendants: NA
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NA
- F. Name of judge to whom case was assigned: NA
- G. Basic claim made: NA
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): NA
- I. Approximate date of disposition: NA

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

##### Jurisdiction

1. The court has Jurisdiction over Plaintiff's claim of violation of his constitutional rights under 28 U.S.C. Section 1331 and 1343 (A)
2. The Plaintiff seeks Declaratory Relief pursuant to 28 U.S.C. Section 2201 and 2202

##### Capacities

3. All of the Defendants named in this action are sued in both their individual and their official capacities.  
color of state law
4. All of the Defendants named in this action acted under color of state law at all relevant times.  
Nature of case
5. This case is about the Defendants depriving the Plaintiff Due Process and Equal Protection of the Law under the United States Constitution and the 14<sup>th</sup> Amendment.

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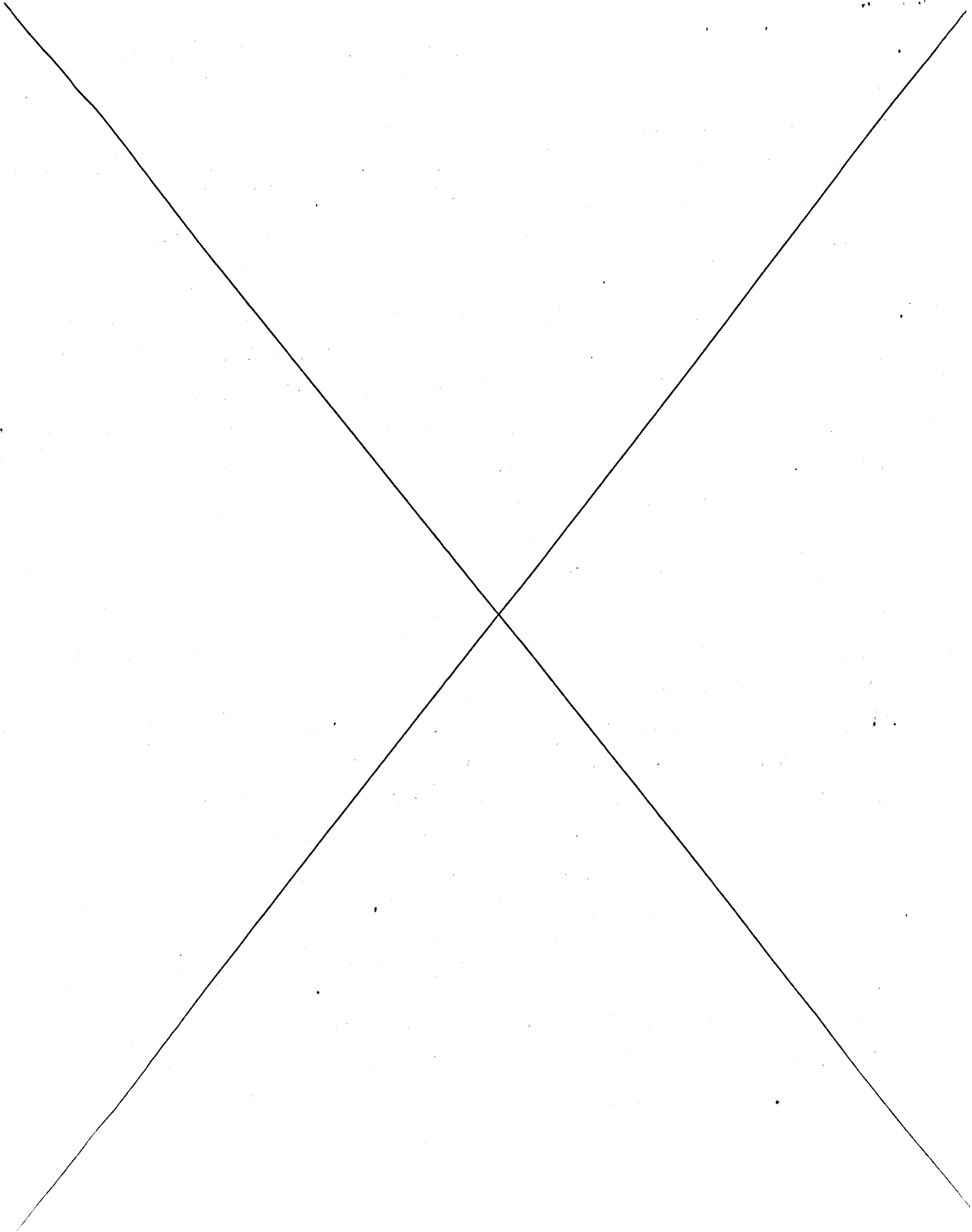
6. On May 10, 1993 Plaintiff was removed from Cook County Jail by Chicago police Detectives and taken to Area #2 police station for questioning for the murder of Darren Payton and also to be a participant in a line-up. During the time the Plaintiff was being interrogated he was beaten by Detectives McDermott and Boylan and as a result of that beating the Plaintiff received injuries to his eye and ribs and also made a coerced confession.
7. On May 6, 2015 the Chicago City Council and Mayor Rahm Emanuel pass a legislation providing financial reparations for the John Burge torture survivors and their family members. To apply for financial reparations the Plaintiff had to fill out a claim form and also send documents supporting his claim to Professor Daniel T. Coyne at Kent College of Law. Because Mr. Coyne would review all claim forms along with any documents that was submitted and make a preliminary determination, on June 16, 2015 Plaintiff sent his claim form and transcripts to Mr. Coyne to apply for financial reparations.

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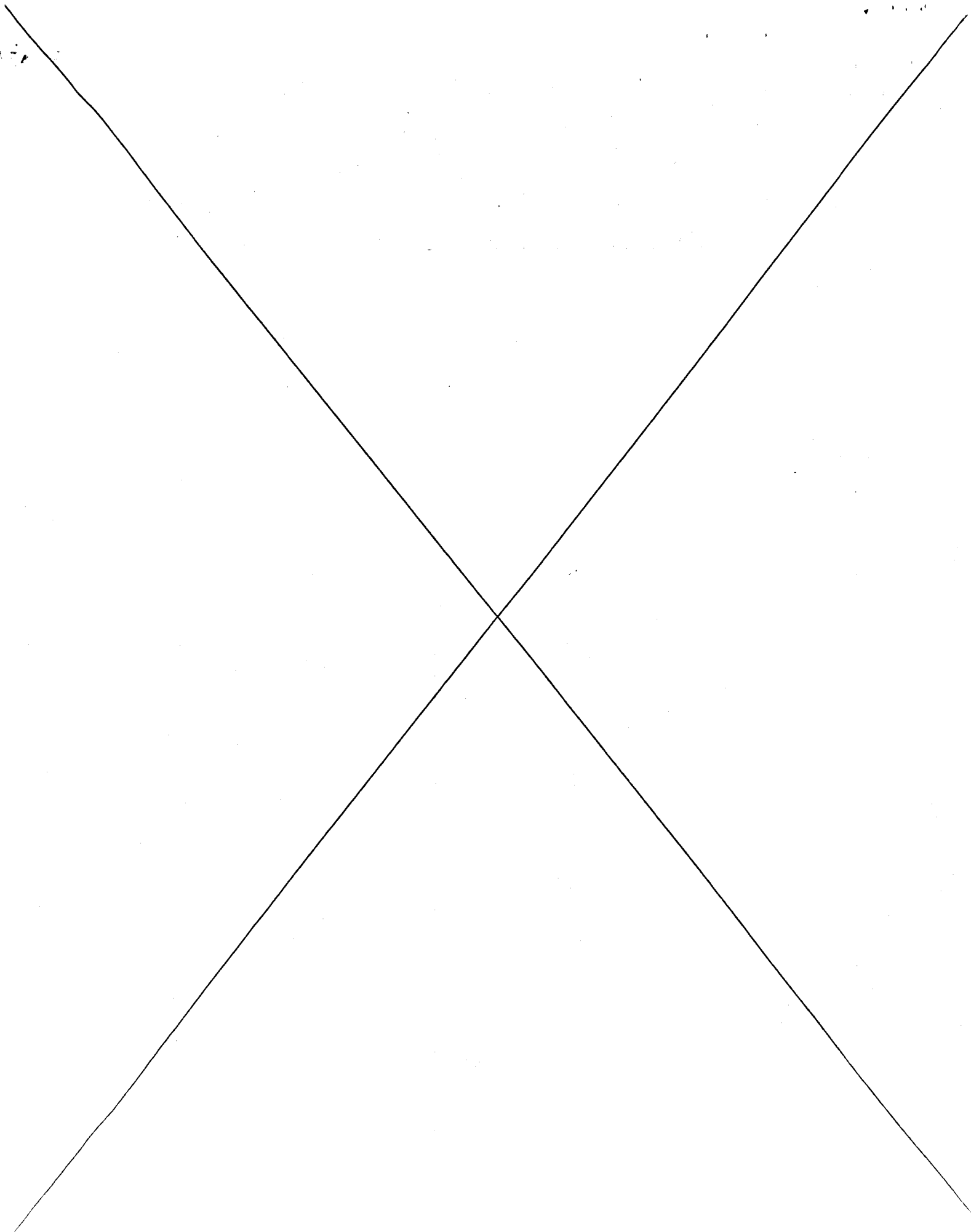
8. On June 23, 2015 Mr. Coyne wrote the Plaintiff a letter saying that he had Review the Plaintiff claim form & transcripts he submitted and find that they provide the Basic information to open an inquiry into Plaintiff claim to see if Plaintiff is eligible for Reparations under the Reparations for Burge torture victims.
9. On September 3, 2015 Plaintiff Receive another letter from Mr. Coyne saying that the Plaintiff was not eligible for financial Reparations under Burge Reparations ordinance because the ordinance Requires that a claimant must set forth a credible claim of torture or physical abuse by Burge or Detectives that work under his command at Area 2 or 3 police station Between 1972-1991 and Because the Plaintiff physical abuse occur May 10, 1993 Plaintiff claim was Denied.
10. This ordinance Pass By Chicago city council and Rahm Emanuel Denied Plaintiff Due Process and Equal Protection of the Law under the United States constitutions and the 14<sup>th</sup> Amendment
11. It is well known that tactics of torture and physical abuse at Area #2 police station go Beyond the time of 1972-1991, there should be no expiration date on Reparations for crimes as Heinous as torture and physical abuse, to set a time line on such crimes





and to say that victims who was Beaten or Torture  
By Detectives at AERA 2 or 3 After 1991  
have no credible claim is a clear violation  
of Due Process and Equal Protection of the  
Law under the United States constitutions  
and the 14<sup>th</sup> amendment.

wherefore for the foregoing Reason the Defendants  
By their actions and inactions Violated Plaintiff  
Rights of Due Process and Equal Protection of  
the Law under the United States constitutions  
and the 14<sup>th</sup> Amendment



V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

as to each claim in this case Plaintiff feel that he should receive the same as what was pass in the Ordinance By the city council & Mayor Emanuel.  
and also pay Plaintiff court fee's in this case and attorney fee's, The Plaintiff ask the court all such other Relief as this Honorable court seems Just and fair

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 25 day of 9, 2015

Marvin Scott  
(Signature of plaintiff or plaintiffs)

MARVIN SCOTT  
(Print name)

B19625  
(I.D. Number)

Western Correctional Center  
2500 Rt. 99 South, Mount Sterling IL, 62353  
(Address)

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MARVIN SCOTT # B19625  
2500 Rt. 99 South  
Mount Sterling, IL 62353

CORRESPONDENCE  
FROM INMATE OF IL  
DEPT OF CORRECTION

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10/02/2015  
US POSTAGE



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15c8864  
Judge Ruben Castillo  
Magistrate Judge Susan E. Cox  
PC 3

PRISONER CORRESPONDENCE  
United States District Court  
219 S. Dearborn Street  
Chicago, IL 60604

LEGAL  
MAIL